

COFFINO LAW GROUP

MEMO ENDORSED

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September 29, 2014

Via ECF and Facsimile

Honorable Naomi Reice Buchwald
 United States District Court
 for the Southern District of New York
 United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312
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USDC SDNY
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SEC v. China Northeast Petroleum Holdings Ltd., et al, No. 12-CV-8696

Dear Judge Buchwald:

Coffino Law Group, LLP ("CLG") is counsel to China Northeast Petroleum Holdings Limited (the "Company") in this action.

Pursuant to Your Honor's Individual Practices Rule No. 2.B., CLG requests a pre-motion conference to obtain leave to file a Motion to Withdraw as counsel to the Company in this action, or, in the alternative, leave to file the motion without a pre-motion conference.

Our Motion to Withdraw is based, in part, on the Company's failure to pay our invoices for nearly two years. The same is true for another matter pending in this Court. Indeed, the Honorable Miriam Cedarbaum, in a pending consolidated securities class action, recently granted our motion to withdraw as counsel for the Company (and certain individuals, including Hongjun Wang, a defendant in this action) based on the non-payment of fees.

Furthermore, like the proposed motion of Atkinson, Andelson, Loya, Rudd & Romo, described by letter earlier today, our motion is additionally based on information obtained in and during privileged and confidential attorney-client communications with the Company. Therefore, consistent with our ongoing obligation to preserve the confidentiality of such communications, and to avoid prejudicing the Company's related rights, we also respectfully request that the Court "so order" this letter permitting us to file our Motion to Withdraw and supporting documents under seal.

Respectfully submitted,

/s/ Michael Coffino

Michael Coffino

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 Naomi Reice Buchwald
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